

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**Case No. 2:21-cr-00089-SDM**

**JAMES V. BARLOW, et al.,**

**Defendants.**

**MOTION TO AMEND PRETRIAL RELEASE CONDITIONS**

Now comes Defendant James V. Barlow, by and through undersigned counsel, and respectfully moves the Court to amend Mr. James Barlow's pre-trial release conditions.

At the change of plea hearing on November 23, 2021, Your Honor granted Mr. Barlow release pending sentencing with release conditions, *See ECF 82*. Condition 9(i) includes a travel restriction limiting Mr. Barlow to Nevada and the Southern District of Ohio for Court purposes only. At the time of that order, this Court allowed Mr. Barlow to travel to Utah for Thanksgiving with clear travel dates and return dates.

Mr. Barlow was also granted amended conditions for a trip to Utah to spend Christmas with family last year (Dec 21, 2021 – Dec 28, 2021), and to allow him to travel to Colorado to pick-up a vehicle (Jan 6, 2022 – Jan 13, 2022). *See ECF 95*.

Mr. Barlow seeks a similar amendment for travel purposes as follows:

1. Travel to Utah for the purpose of vacation with family.
  - a. Travelling by auto to Utah leaving Nevada on August 30, 2022  
return no later than September 8, 2022.
2. Travel to Utah for the purpose of attending a wedding for his uncle Lamar.
  - a. Travelling by auto to Utah leaving Nevada September 22, 2022,  
return no later than September 26, 2022.

Counsel for Mr. Barlow has spoken with Mr. Hunter for the government, who does not oppose this request but defers to Mr. Barlow's pretrial release officers' decision. Counsel has also spoken with Mr. Barlow's pretrial officers (in both Nevada and Ohio) who also would not oppose these requests.

For all of these reasons, Mr. Barlow respectfully asks the Court to amend his release conditions as requested to allow him to travel outside of Nevada.

Respectfully submitted,  
/s/ Christopher Mishler  
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Attorney for Defendant James Barlow

### **CERTIFICATE OF SERVICE**

The Undersigned hereby certifies that a copy of the foregoing Motion was served upon Mike Hunter, Esq., attorney for Government, by email on

this 24<sup>th</sup> day of August, 2022.

/s/ Christopher Mishler  
Christopher Mishler  
(NV14402)